REMARKS

Claims 1-24 and 27-30 are pending in the present Application. Claims 1, 7, 11, and 19 have been amended and Claims 31-34 have been added, leaving Claims 1-24 and 27-34 for consideration upon entry of the present Amendment.

Support for the amendment to Claims 1, 7, 11, and 19 and for new Claims 31-34 can at least be found in the claims as originally filed and in the specification at least at page 27.

No new matter has been introduced by these amendments. Reconsideration and allowance of the entire Application is respectfully requested in view of the above amendments and the following remarks.

IDS

With regards to the information disclosure statement filed December 19, 2003, the Examiner returned a PTO-1449 form, but did not initial as having considered the "Office Action for Application Serial No. 09/748,470 dated June 19, 2003". It is noted that Applicants submitted a copy of the art cited on the PTO-1449 form in response to recent case law with regard to their duty to disclose. (See *Dayco Products, Inc. v. Total Containment, Inc.*, 329 F.3d 1358, 66 USPQ2d 1801 (Fed. Cir. 2003). Accordingly, Applicants respectfully request the Examiner to consider this art, and respectfully request the Examiner to return a signed copy of the PTO-1449 form indicating that the Examiner has considered this art.

Claim Rejections Under 35 U.S.C. §§ 102(e) and 103(a)

It is briefly noted that Claims 27-30 are shown in the Office Action summary sheet as being rejected, but are not addressed in the Office Action. Moreover, Claims 25-26 have been cancelled in the previous Amendment (i.e., Amendment dated December 19, 2003, but are shown as being rejected. In order to be fully responsive to the present Office Action, it is assumed that the Examiner intended to reject all of the pending claims (Claims 1-24 and 27-30).

Claims 1-5, 7-26 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Ikuko et al. (U.S. 6,255,775) ("Ikuko"). "A claim is anticipated only if each and every

element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. V. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). Moreover, "[t]he identical invention must be shown in as complete detail as is contained in the * * * claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989).

Independent Claims 1 and 7 comprise, *inter alia*, the following limitations:

> causing a material from said layer material source to attach to a first region of said substrate through said opening, while relative positions of said substrate, said mask, and said layer material source are set to a first positional relationship; causing relative movement between said mask, said layer material source, and said substrate to change relative positions of said substrate, said mask, and said layer material source from said first positional relationship to a second positional relationship; and causing said material to attach to a second region of said substrate through said opening, while relative positions of said substrate, said mask, and said layer material source are set to said second positional relationship.

Similarly, independent Claims 11 and 19, comprise, *inter alia*, the following limitations:

> causing an emissive material from said emissive material source to attach to a first region of said substrate through said mask, while relative positions of said substrate, said mask, and said layer material source are set to a first positional relationship; sliding a relative position between said mask, said emissive material source, and said substrate by a predetermined pitch corresponding to a size of the pixel of said substrate to change relative positions of said substrate, said mask, and said layer material source from said first positional relationship to a second positional relationship; causing said emissive material to attach to a second region of said substrate through said opening, while relative positions of said substrate, said mask, and said layer material source are set to said second positional relationship.

Ikuko does not disclose, either expressly or inherently, these limitations. More particularly, accordingly to Ikuko, when referring to one opening formed in one mask, a thin film is formed in different locations on a substrate by depositing, through the one opening, material from a plurality of different evaporation sources, without changing the positional relationship between the substrate and the mask/plurality of evaporation sources. Further, in order to execute this process in each of a plurality of openings, the opening size, the angle of side portions of the opening, and the like are changed in accordance with the distance from the evaporation sources.

Accordingly, in Ikuko, the positional relationship among the substrate, the mask opening, and the evaporation sources is extremely significant, and, when a position of any one of them deviates, the shape and location of the thin film formed on the substrate is significantly altered. In other words, in Ikuko, a desired thin film cannot be formed on the substrate if the position of the substrate, the mask, or the evaporation sources is changed. It is therefore evident that Ikuko fails to describe or suggest, for example, changing the relative position between the substrate and the mask and the layer material source from a first positional relationship to a second positional relationship after a material from the layer material source has been attached to a first region of the substrate.

Moreover, because of the importance of the positional relationship in Ikuko and the fact that Ikuko cannot have relative movement between the substrate and the mask and the layer material source, Ikuko would not be able to be combined with any other references to reach the claimed invention.

The Examiner asserted in Paper No. 7 (i.e., the Office Action dated June 24, 2003) that Ikuko does not disclose moving the mask laterally, but longitudinal movement of the mask to adjust the distances d_1, d_2, and d_3, and the pitch p is described. However, the recitation in Ikuko corresponding to this contention simply refers to the fact that adjustments in positions are made in advance because it is significant to achieve a precise positional relationship. Again, as mentioned above, absent is any description or suggestion of changing the relative position between the substrate and the mask and the layer material source from a first positional relationship to a second positional relationship after a material from the layer material source is attached to a first region of the substrate.

In addition, while the prior art of Ikuko discloses moving a shadow mask relative to the substrate, the prior art section of Ikuko makes no reference to changing the relative position between an evaporation source and a substrate. As such, Ikuko does not disclose, either expressly or inherently, sequentially forming discrete layer patterns on a substrate through an opening of a mask by changing the relative position between the substrate and the mask and the layer material source. Rather, it appears that Ikuko inherently assumes absence of relative movement between the substrate and the mask/layer material source. Accordingly, Applicants respectfully request that the rejection be withdrawn.

Claims 1-5 and 7-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Fukuzawa et al. (U.S. 6,459,193) ("Fukuzawa") in combination with Ikuko. For an obviousness rejection to be proper, the Examiner must meet the burden of establishing that all elements of the invention are disclosed in the prior art; that the prior art relied upon, coupled with knowledge generally available in the art at the time of the invention, must contain some suggestion or incentive that would have motivated the skilled artisan to modify a reference or combined references; and that the proposed modification of the prior art must have had a reasonable expectation of success, determined from the vantage point of the skilled artisan at the time the invention was made. *In re Fine*, 5 U.S.P.Q.2d 1596, 1598 (Fed. Cir. 1988); *In Re Wilson*, 165 U.S.P.Q. 494, 496 (C.C.P.A. 1970); *Amgen v. Chugai Pharmaceuticals Co.*, 927 U.S.P.Q.2d 1016, 1023 (Fed. Cir. 1996).

The Examiner acknowledges that Fukuzawa does not describe or suggest relative movement between the mask and the layer material, and the substrate. For example, Fukuzawa fail to describe or suggest changing the relative position between the substrate and the mask and the layer material source from a first positional relationship to a second positional relationship after a material from the layer material source is attached to a first region of the substrate. In addition, as explained above, Ikuko does not disclose that limitation either. Accordingly, combining Fukuzawa with Ikuko does not result in the configuration in which, for example, the mask/layer material source and the substrate are moved relative to one another. As such, it is not obvious to those skilled in the art to sequentially shift the relative position between the mask/layer material source and the substrate so as to form a pattern on the substrate in accordance with the pattern of the opening of the mask.

According to the present invention, because discrete layer patterns are formed on the substrate while changing the relative position between the layer material source/mask and the substrate, the conditions of positional relationship between the target layer-forming location on the substrate and the mask/layer material source can be made identical in any location on the substrate. It is therefore possible to form a uniform layer at high precision in a pattern according to the mask opening in any location on the substrate. This

advantage absolutely cannot be accomplished by Ikuko or Fukuzawa, which do not include changing the relative position between the layer material source/mask and the substrate. Accordingly, Applicants respectfully request that the rejection be withdrawn.

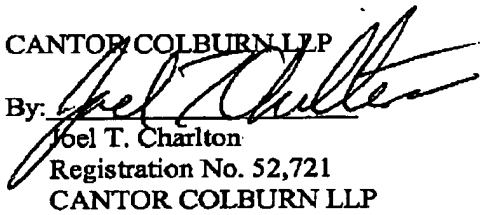
Claim 6 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Ikuko in combination with Tonucci et al. (U.S. 6,087,274) ("Tonucci"). Claim 6 includes all of the limitations of Claim 1. Tonucci fails to cure the deficiencies of Ikuko. For example, Tonucci fails to describe or suggest changing the relative position between the substrate and the mask and the layer material source from a first positional relationship to a second positional relationship after a material from the layer material source is attached to a first region of the substrate. Accordingly, combining Tonucci with Ikuko does not result in the configuration in which the mask/layer material source and the substrate are moved relative to one another as claimed by Applicants. As such, it is not obvious to those skilled in the art to sequentially shift the relative position between the mask/layer material source and the substrate so as to form a pattern on the substrate in accordance with the pattern of the opening of the mask. Accordingly, Applicant respectfully requests that the rejection be withdrawn.

In view of the foregoing, it is respectfully submitted that the instant application is in condition for allowance. Accordingly, it is respectfully requested that this application be allowed and a Notice of Allowance issued. If the Examiner believes that a telephone conference with Applicants' attorneys would be advantageous to the disposition of this case, the Examiner is cordially requested to telephone the undersigned.

In the event the Commissioner of Patents and Trademarks deems additional fees to be due in connection with this application, Applicants' attorney hereby authorizes that such fee be charged to Deposit Account No. 06-1130.

Respectfully submitted,

CANTOR COLBURN LLP

By: 

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